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February 16, 2022

Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*
S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

The annexed documents pertaining to Ghislaine Maxwell's motion for a new trial, previously submitted under seal, contain proposed redactions in conformance with the Court's Order (Dkt. 596).

The proposed redactions are intended to ensure the integrity of any fact-gathering process to uncover the truth surrounding Juror 50 's conduct during the *voir dire* process. Any inquiry will be focused primarily on the testimony of Juror 50. The proposed redactions reduce the risk that his testimony will be tailored based on a preview of information central to the inquiry or otherwise tainted by outside information and influence. The proposed redactions pertain to the following information:

- Juror 50's exact responses to the questions on his jury questionnaire, which is being kept temporarily under seal. *See* Dkt. 596 at 5, fn 1.
- Data about the responses of other jurors and potential jurors to the jury questionnaire.
- Details of investigative steps the defense has taken and evidence uncovered thus far.
- The defense's view of the underlying facts.
- The scope of the defense's requested discovery in advance of the hearing.

Very truly yours,

/s/

BOBBI C. STERNHEIM

Attachments (to be kept under seal pending the Court's decision regarding redactions)

cc: Counsel of Record